

REG. CONTROL  
GOLDEN, CO.

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RF-10644

# EG&G ROCKY FLATS

DIST.	
AL, M.E.	
NGAME, A.H.	
Y, W.S.	
CH, D.B.	
IVAL, G.J.	
S, J.G.	
EEA, D.W.	
R.E.	
J.A.	
ER, W.S.	
N, P.M.	
J, B.J.	
AN, L.K.	
Y, T.J.	
HL, T.	
S, J.G.	
HINS, N.M.	
SON, D.T.	
R.E.	
TER, A.W.	
G.E.	
NALD, M.M.	
NNA, F.G.	
ROSE, J.K.	
SAN, R.V.	
ER, G.L.	
TO, V.M.	
G, T.L.	
LIN, N.B.	
VARTZ, J.K.	
OCK, G.H.	
ART, D.L.	
ER, S.G.	X
J.P.M.	X
REYS, G.M.	
CKMAN, T.D.	X
DFORD, J.A.	X
GLE, D.A.	X
ELLEN, J.	X
WELL, J.	X
APP, M.	X
BURR, R.	X
RES CONTROL	X
RECORD/080	X
FILE	X
1130G	

EG&G ROCKY FLATS, INC.  
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

October 20, 1994

94-RF-10644

F. R. Lockhart  
Environmental Restoration Division  
DOE, RFFO

## NEW PROPOSED INTERAGENCY AGREEMENT MILESTONES AND BUDGET INCREASE FOR FISCAL YEAR 95 - SRK-212-94

Action: Transmit Dates to Colorado Department of Public Health and Environment (CDPHE) and Environmental Protection Agency (EPA)

This letter transmits the dates that EG&G can commit to delivery of Operable Unit 4 (OU 4) Phase I Interagency Agreement (IAG) milestones, provided sufficient funding is added to the OU 4 Major Activity Description Document (MADD) Fiscal Year 95 (FY95) budget. A draft of the schedule was presented at the September 20, 1994 Joint Working Group meeting and the final schedule is available from my office.

The final schedule incorporates schedule reserve EG&G will use in managing the project. Schedule risk for three significant items should be noted: (1) no reserve was added for delays in regulator reviews and approvals, despite experience to date, per the agreement of the Joint Working Group; (2) risk due to the treatment unit locations being unspecified; and (3) risk due to immature definition of tasks to ship treatability samples. The dates for the IAG Phase I milestones follow. A draft letter to the regulators is attached for your convenience.

Submit Proposed IM/IRA Decision Document	February 10, 1995
Submit IM/IRA Responsiveness Summary	June 9, 1995
Submit Final IM/IRA Decision Document and Responsiveness Summary	August 29, 1995
Submit Final IM Title II Design	December 18, 1995
Start of Soil Movement	October 28, 1996

SIFICATION:

CLASSIFIED	
IDENTIAL	
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AUTHORIZED CLASSIFIER  
SIGNATURE  
MENT CLASSIFICATION  
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PLY TO RFP CC NO:

IN ITEM STATUS  
TIAL OPEN  
CLOSED  
APPROVALS:  
TYPIST INITIALS

Please note that the previous terminology for the last milestone, "Start Of Construction", has repeatedly led to confusion over what element of field work is intended. We suggest using the terminology above, "Start of Soil Movement", as more descriptive of the element needed to satisfy the commitment. The change will also allow us to use the terminology "start of construction" in the usual technical sense of the first element of field work authorized by the Decision Document. Returning to common usage should facilitate our internal communications.

To implement the plan reflected above, additional funding is required in FY95: approximately \$ 2.3 million to perform the planned work. Based on our understanding of RFFO's intent, we will initiate the Baseline Change Proposal (BCP) immediately. The specific amount and potential source of the funds will be identified through the BCP process.

In addition to the identified funding needs there is additional cost risk: locations for the sludge and pondcrete treatment units have not been determined and funding may be needed to make the space available for use. While a detailed estimate cannot be prepared until a specific space is chosen, we estimate that a cost risk in FY95 on the order of \$ 1.3 million should be anticipated. The amount of \$ 1.3 million does not include any cost contingency,

F. R. Lockhart  
October 20, 1994  
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and the current, baseline MADD funding does not include any substantive contingency. We previously calculated a contingency of \$ 3.0 million would be needed for the Phase I remediation in FY95.

This letter addresses funding for the Phase I remediation only. Completion of the BCP to be developed from this letter will address the first MADD assumption (see attached ADS1258 assumptions). Other assumptions will require validation, and other areas of the Solar Pond Projects MADD contain unfunded tasks. For your information, a copy of our current unfunded list is attached; only the Sludge and Remix Engineering activities and sludge treatability studies are included in the numbers above. Also, we anticipate proposing an accelerated Phase II remediation plan to RFFO which is not addressed in this letter.

RFFO should be aware that the total potential cost increase for the OU 4 FY95 MADD, based on the changes documented in this letter, is about \$ 6.6 million which includes the \$3 million contingency. Offering the above dates to the regulators as commitments also commits the site to fund the additional budget. Counting the balance of unfunded activities of \$1.8 million, the total additional required funding comes to \$8.4 million. In addition, a new scope to address the metal containers on the 904 Pad just occurred when CDPHE requested the Part B permit application. While this scope is anticipated to be transferred to waste management, it will still be funded by EM 40.

For your convenience, a table comparing IAG commitment dates at various steps in the project evolution and a draft transmittal to the regulators are attached. If you would like to discuss the schedule and cost elements further, please contact me. Alternate contacts include Don Ringle, extension 8603, for MADD issues; Andy Ledford, extension 8673, for remediation construction issues; and Tom Beckman, extension 8725, for sludge and pondcrete treatment issues.



S. R. Keith  
Program Manager  
Solar Pond Projects  
EG&G Rocky Flats, Inc.

KCL:pjm

Orig. and 1 cc - F. R. Lockhart

Attachments:  
As Stated (4)

cc:			
S.	Howard	-	DOE, RFFO
S.	Surovchak	-	" "
M.	Witherill	-	" "

DRAFT

DRAFT

DRAFT

94-DOE-XXXXX

Mr. Martin Hestmark  
U. S. Environmental Protection Agency, Region VIII  
ATTN: Rocky Flats Project Manager, 8HWM-RI  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

Mr. Gary Baughman  
Hazardous Waste Facilities Unit Leader  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

In accord with the dispute resolution of July 27, 1994, Department of Energy (DOE) submits the following Interagency Agreement (IAG) commitment dates for Operable Unit 4 (OU 4) Phase I Remediation.

Submit Proposed IM/IRA Decision Document	February 10, 1995
Submit IM/IRA Responsiveness Summary	June 9, 1995
Submit Final IM/IRA Decision Document and Responsiveness Summary	August 29, 1995
Submit Final IM Title II Design	December 18, 1995
Start of Soil Movement	October 28, 1996

Please note that the previous terminology for the last milestone, "Start Of Construction", has repeatedly led to confusion over exactly what element of field work will fulfill the task. Per your letter of February 18, 1994, start of Building 788 activities will not be deemed as the start of construction for the OU 4 closure action. Since the Building 788 activities are authorized by the Decision Document and represent a substantial field effort, the unusual definition obscures the actual construction plans. We suggest using the terminology above, "Start of Soil Movement", as more descriptive of the element needed to satisfy the commitment. The change will also allow us to use the terminology "start of construction" in the usual technical sense of the first element of field work authorized by the Decision Document. Returning to common usage should facilitate our internal communications.

During your review, DOE will begin work on this new schedule in anticipation of your approval. Please provide a response at your earliest convenience. If you would like to discuss this further, contact Frazer Lockhart on 966-7846.

Sincerely,

Steven W. Slaten  
IAG Project Coordinator

M. Hestmark  
G. Baughman  
94-DOE-xxxxx

Attachment 1  
94-RF-10644  
Page 2 of 2

cc:  
S. Howard, PME, RFFO  
F. Lockhart, ER, RFFO  
M. Witherill, ER, RFFO  
J. A. Ledford, EG&G  
S. R. Keith, EG&G  
S. G. Stiger, EG&G

# SOLAR PONDS FY95 UNFUNDED ACTIVITIES

18-Oct-94

## EM40

<u>WP #</u>	<u>WP DESCRIPTION</u>	<u>ACTIVITY #</u>	<u>ACTIVITY DESCRIPTION</u>	<u>DOLLARS</u>
12153	WASTE STORAGE	54000	PAD OPERATIONS	918,274
12153	WASTE STORAGE	56000	REPACK/RESTACK 904 PAD	497,792
12153	WASTE STORAGE	TBD	WASTE CHARACTERIZATION	183,402
12153	WASTE STORAGE	TBD	RELABELING FOR CODE F039	163,967
TOTAL				<u>1,763,435</u>
12165	PHASE II RFI	Z0000	DIRECT PROJECT SUPPORT	69,391
12189	SLUDGE & REMIX ENGINEERING	R1400	IPC TITLE II DESIGN	833,362
12189	SLUDGE & REMIX ENGINEERING	R1100	IPC TREATABILITY STUDIES	50,000
12189	SLUDGE & REMIX ENGINEERING	S1100	SLUDGE TREATABILITY STUDIES	50,000
TOTAL				<u>933,362</u>
TOTAL EM 40 UNFUNDED ACTIVITIES				<u>2,766,188</u>

## ADS 1258 OU4 SOLAR PONDS ASSUMPTIONS

- Sludge and inventoried pondcrete are to be minimally treated and disposed of under the engineering cap. Full impact of this scope change has not been fully assessed. In addition, these impacts to IAG milestones are in negotiation with the regulators. Impacts will be handled through the change system. This schedule is based on current funding constraints and review cycles which will probably be changed during negotiations. The Solar Ponds Project will be rebaselined in the December 1995 time period to incorporate the full impact of the scope change and review cycle requirements.
- Rocky Flats Environmental Technology Site (RFETS) Environmental Restoration Program (ER) will continue to be managed as a DOE Major System Acquisition (MSA).
- The existing Davis-Bacon "covered" determination for the construction activities will not change.
- Design and procurement durations associated with sludge treatment are based on Safety Category III, Quality Level III, and system classification.
- HNUS will be sole sourced as the Conceptual Design and Treatability MTS subcontractor. Title II, III, and startup assistance will be awarded through the A-E MTS subcontract vehicle. Waste Certification and Onsite Transportation are an EG&G responsibility.
- The minimal treatment of pondsludge and pondcrete will be performed on the 750 Pad and/or 904 Pad. Space will be made available by shipping LDR compliant saltcrete to Envirocare, moving waste to the new centralized waste storage facility, or some other location. Costs of moving the waste are not included in the Baseline.
- One process train will be constructed to process both C Pond/Clarifier and A/B Pond sludges. This equipment will be located in the vicinity of the 750 Pad. A crushing system, at minimum, will be required for pondcrete processing.
- EnviroCare will be the waste disposal site for the wastes generated during pond closure (and not placed under the engineered barrier) and will be available per the closure schedule; no new storage areas are needed at Rocky Flats for this material.
- IHSS 176 will be annexed as part of OU 4 closure.
- Initial issue of the Decision Document (DD) does not include the C-Pond and B-South Pond Remedial Investigation. The C-Pond and B-South Pond Remedial Investigation will be included through amendment of the IM/IRA when available and is excluded from the deliverable-commitments for the IAG.
- A Corrective Action Management Unit (CAMU) is granted by allowing soils on the edge of Pond 207C to be excavated and placed under the cap without treatment to comply with Land Disposal Restrictions.

- The DOE will concur with and approve the hazard classification of the remediation of OU 4 to be Category III.
- Removal of liners and soil offsite will not be required for pond partial closure, though some minimal consolidation of these materials within the pond IHSS may occur.
- The scope of NEPA activities for Phase I remediation will be an Environmental Assessment only (an Environmental Impact statement will not be required).
- The stabilized sludge and pondcrete waste product must meet waste acceptance criteria of Performance standards as defined in the IM/IRA DD. FO39 analyte listing will not be required.
- 750 and 904 Pad operations, maintenance, and RCRA compliance, while still funded by EM 40, are in waste management scope, not Solar Ponds' scope. Funds are included in this Baseline.

## OU4 IAG Milestones

<i>Milestone</i>	<i>Original IAG</i>	<i>Streamline<sup>1</sup></i>	<i>1994 Dispute<sup>2</sup></i>	<i>Current<sup>3</sup></i>
<i>➤ IM/IRA IAG</i>				
Draft Proposed IM/IRA DD	Apr 14, 1994	Apr 14, 1994 [May 27, 1994]	N/A	<b>May 27, 1994</b>
Proposed IM/IRA DD	Sep 12, 1994	Jun 24, 1994 [Aug 6, 1994]	Jan 26, 1995	<b>Feb 10, 1995</b>
IM/IRA Responsiveness Summary	Jan 25, 1995	Nov 1, 1994 [Dec 14, 1994]	Jun 5, 1995	<b>June 9, 1995</b>
Final IM/IRA DD and Responsiveness Summary	Apr 24, 1995	Jan 13, 1995 [Feb 25, 1995]	Jul 24, 1995	<b>Aug 29, 1995</b>
Final IM/IRA Title II Design	Jun 24, 1996	Feb 10, 1995	Jun 21, 1995	<b>Dec 18, 1995</b>
Start of IM/IRA Construction	Jan 28, 1997	Sep 27, 1995	Sep 27, 1995	<b>Oct 28, 1996</b>
<i>➤ Other IAG</i>				
All Ponds Empty	N/A	Jan 20, 1995	Jan 20, 1995	<b>Jan 20, 1995</b>

Notes:

1. Date in brackets represents change made in response to Regulator-requested 43 day extension.
2. Dates were proposed to support increase in scope associated with disposition of pond sludge as part of the interim measure. Dates were rejected by Regulators.
3. New IAG commitment dates.